

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2022 DEC 20 PM 2:15

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRETT E. COLLINS (1),  
a/k/a "B.J.,"

and

ROBERT L. HALEY (2),  
Defendants.

CASE NO. *2:22-cr-00241*

JUDGE *Markley*

INDICTMENT

21 U.S.C. § 846

21 U.S.C. § 841(a)(1) & 841(b)(1)(C)

18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D)

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute Cocaine)

1. Beginning in or about September 2022 and continuing through and including the date of this Indictment, the exact dates being unknown, in the Southern District of Ohio and elsewhere, the defendants, **BRETT E. COLLINS, a/k/a "B.J.,"** and **ROBERT L. HALEY**, knowingly and intentionally combined, conspired, confederated, and agreed with each other and with other persons known and unknown to the Grand Jury to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(C).

**COUNT 2**  
**(Distribution of Fentanyl)**

2. On or about August 24, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (hereinafter “fentanyl”), a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 3**  
**(Distribution of Fentanyl)**

3. On or about August 29, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 4**  
**(Distribution of Fentanyl)**

4. On or about August 31, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 5**  
**(Distribution of Fentanyl)**

5. On or about September 2, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 6**  
**(Distribution of Fentanyl)**

6. On or about September 8, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 7**  
**(Distribution of Fentanyl)**

7. On or about September 8, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a “B.J.”** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 8**  
**(Distribution of Fentanyl)**

8. On or about September 28, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a "B.J.,"** knowingly and intentionally distributed pills containing a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. § 841(a)(1) & 841(b)(1)(C).**

**COUNT 9**  
**(Engaging in the Business of Dealing in Firearms without a License)**

9. Beginning in or about August 2022 and continuing through and including the date of this Indictment, the exact dates being unknown, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a "B.J.,"** not being a licensed dealer of firearms, willfully engaged in the business of dealing in firearms.

**In violation of 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D).**

**COUNT 10**  
**(Felon in Possession of a Firearm)**

10. On or about August 29, 2022, in the Southern District of Ohio, the defendant, **BRETT E. COLLINS, a/k/a "B.J.,"** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, specifically: a Taurus, Model 1911 Commander, 9mm handgun (S/N: ACA414149), and the firearm was in and affecting interstate and foreign commerce.

**In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).**

**FORFEITURE ALLEGATION A**

11. The allegations of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America under 21 U.S.C. § 853(a)(1) and (2).

12. Upon conviction of any of the offenses alleged in Counts 1-8, the defendants, **BRETT E. COLLINS, a/k/a “B.J.,”** and **ROBERT L. HALEY**, shall forfeit to the United States all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s).

13. Substitute Assets: If any of the forfeitable property described above, as a result of any act or omission of the defendants, **BRETT E. COLLINS, a/k/a “B.J.,”** and **ROBERT L. HALEY**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants, **BRETT E. COLLINS, a/k/a “B.J.,”** and **ROBERT L. HALEY**, up to the value of the forfeitable property.

**Forfeiture notice pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**FORFEITURE ALLEGATION B**

14. The allegations of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America under 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

15. Upon conviction of any of the offenses alleged in Counts 9-10, the defendant, **BRETT E. COLLINS, a/k/a "B.J.,"** shall forfeit to the United States any firearms or ammunition involved or used in such offense(s), including, but not limited to the following:

	<b>Make</b>	<b>Model/Description</b>	<b>Serial #</b>	<b>ATF #</b>
a.	Taurus	1911 Commander 9mm pistol	ACA414149	Item # 5
b.	American Tactical	FXH-45 .45 caliber pistol	FX003054	Item #10
c.	FNH	FNS-40 .40 caliber pistol	GKU0123475	Item #16
d.	Sig Sauer	P320 9mm pistol	M17-081336	Item #18
e.	Glock	Glock 23 .40 caliber pistol	SMR121	Item #23
f.	Glock	Glock 19 9mm caliber pistol	BTXD613	Item #25
g.	Glock	Glock 30 .45 caliber pistol	YWK667	Item #31
h.	Glock	Glock 31 .357 caliber pistol	YFY230	Item #35
i.	Palmetto State Armory	PA-15 .300 caliber pistol	PA107011	Item #37

j.	Glock	Glock 42 .380 caliber pistol	ACKK184	Item #38
k.	HK	P30 .40 caliber pistol	219-016958	Item #39
l.	Glock	Glock 19X 9mm pistol	BH DU371	Item #40
m.	Ruger	P89 9mm pistol	305-16306	Item #48
n.	Freedom Ordnance	FX-9 9mm pistol	004747	Item #53
o.	Smith & Wesson	Model 442 .38 caliber revolver	CWZ1279	Item #54
p.	DPMS	A15 .223 caliber pistol	L4039697	Item #59
q.	Keltec	Sub-2000 9mm rifle	FG3402	Item #63
r.	Smith & Wesson	Model 5906 9mm pistol	TDA2432	Item #64
s.	Hi-Point	CF380 .380 caliber pistol	P8094292	Item #65
t.	Keltec	Sub-2000 9mm rifle	FGN031	Item #66
u.	Springfield Armory	XD-9 9mm pistol	MG471009	Item #69
v.	FN	Model 503 9mm pistol	CV014920	Item #70
w.	Taurus	PT709 Slim 9mm pistol	TJZ00714	Item #71
x.	SAR Arms	SAR 9 9mm pistol	T1102-21BV74206	Item #75



y.	Keltec	PF-9 9mm pistol	S7S65	Item #119
z.	Canik55	TP-9SF 9mm pistol	T647221AT05800	Item #120
aa.	Ruger	LCP .380 caliber pistol	37133888	Item #117
bb.	Glock	Glock 22 .40 caliber pistol	BHES527	Item #121

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

s/Foreperson

Foreperson

**KENNETH L. PARKER**  
**UNITED STATES ATTORNEY**

  
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**NOAH R. LITTON (0090479)**  
Assistant United States Attorney